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A Limited Liability Partnership

2 Including Professional Corporations

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SEAGATE TECHNOLOGY LLC

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 IN RE SEAGATE TECHNOLOGY LLC  
LITIGATION

19 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DECLARATION OF TENAYA M.  
RODEWALD IN SUPPORT OF SEAGATE  
TECHNOLOGY LLC'S OPPOSITION TO  
PLAINTIFFS' ADMINISTRATIVE  
MOTION FOR LEAVE TO FILE  
SECOND SUPPLEMENTAL BRIEF IN  
SUPPORT OF CLASS CERTIFICATION**

**Date:** June 15, 2018

**Time:** 9:30 a.m.

**Place:** Courtroom G

**Judge:** Hon. Joseph C. Spero

Second Consolidated Amended Complaint  
filed: July 11, 2016

DECLARATION OF TENAYA RODEWALD

I, Tenaya Rodewald, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney with Sheppard, Mullin, Richter & Hampton LLP, attorneys of record for Defendant, Seagate Technology LLC (“Seagate”).

2. If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief.

3. This declaration is submitted in support of Seagate’s Opposition to Plaintiffs’ Administrative Motion to for Leave to File Second Supplemental Brief in Support of Class Certification.

4. I reviewed Plaintiffs’ Exhibit 72 submitted in support of their proposed Second Supplemental Brief. I also reviewed each of the documents cited in Exhibit 72, and Plaintiffs’ Exhibits 73 – 77.

5. I prepared the table attached hereto as **Exhibit 1**, which responds to each of the rows and documents in Plaintiffs’ Exhibit 72, as well as Plaintiffs’ Exhibits 73 – 77. The statements under “Seagate’s Response” in the last column of Exhibit 1 hereto are based on my personal examination of the documents discussed therein, and accurately report my observations.

6. As stated in Exhibit 1, rows 3, 6, 7, 11, 16, and 22, I found the reviews cited by Plaintiffs in Seagate’s documents FED\_SEAG0076936, FED\_SEAG0076615, FED\_SEAG0076609, FED\_SEAG0094986, FED\_SEAG0094984, FED\_SEAG0076421, and followed the links in those Seagate documents to the actual reviews on the Amazon.com website. Attached hereto as **Exhibits A – E, G, I, K** are true and correct copies of those linked reviews as published on Amazon.com.

7. I searched Amazon.com for hard drive products from any manufacturer. I clicked on various products from companies other than Seagate that had a substantial number of reviews (over 100). I easily found the product review summaries attached hereto as **Exhibit J**.

8. **Exhibits H and L** hereto are true and correct copies of documents Seagate produced in this action.



**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Anna S. McLean, attest that the signatory of this document, and on whose behalf the filing is submitted, concurs with the filing's content and has authorized the filing.

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By

/s/ Anna S. McLean

ANNA S. McLEAN

Attorneys for SEAGATE TECHNOLOGY, LLC